

SETTLEMENT STATEMENT

EXHIBIT B

Estate of Daniel L. Simmons, Sr. v. The United States of America

Case No: 2:16-cv-2378-MBS

Total Amount of Settlement:	\$6,500,000.00
Less Attorneys' fee (25%):	<u>\$1,625,000.00</u>
Balance:	\$4,875,000.00
Less Office Expenses to be Reimbursed:	
1. PIERCE SLOAN LLC:	\$50,083.71
Less Estate Claims and Advance Liens:	
1. Rose Simmons:	\$15,823.83
2. SCFCU:	\$36,487.08
3. Bridgeloan:	\$27,484.94
Total Office Expenses, Estate Claims and Advance Liens to be Reimbursed:	\$129,879.56
Balance Due to Client:	\$4,745,120.44
Payable to Rose Simmons:	\$2,372,560.22
Payable to Daniel Simmons, Jr.:	\$2,372,560.22

I hereby acknowledge that my attorney has provided me with a copy of my file. I hereby authorize the destruction of the file and acknowledge and confirm that there are no pending or threatened legal proceedings known to me or my attorney.

All known medical bills, liens and expenses will be paid. Any other medical bills, liens and/or expenses are the responsibility of the client. I, Daniel L. Simmons, Jr., as Personal Representative of the Estate of Daniel L. Simmons, Sr., instruct disbursement as set forth above.

Approved and received the sum of \$4,745,120.44 this ____ day of _____, 2021.

Daniel L. Simmons, Jr.
Personal Representative of the
Estate of Daniel L. Simmons, Sr.

Pierce Sloan Kennedy & Early LLC
 321 East Bay Street (29401)
 Post Office Box 22437
 Charleston, South Carolina 29413-2437

Main #: 843-722-7733

Fax #: 843-722-7732

Daniel Simmons

Inv. Date: 10/28/21

Inv. #: Draft

MATTER: P263500
RE: Simmons, Daniel Jr., Estate of v. Federal Bureau of Investigation

DISBURSEMENTS	Disbursements	Receipts
Jul-31-15 Postage from the month of July	10.58	
Oct-31-15 Court Fees PACER Inv# 2613916-Q32015	2.90	
Nov-30-15 Copying 2nd floor copier from the month of November.	2.00	
	0.70	
Dec-31-15 Postage from the month of November	9.25	
Dec-31-15 Copying 3rd floor copier from the month of December.	2.25	
Feb-01-16 Copying 3rd floor, from the month of January	3.00	
Mar-10-16 Parking - JCW CHARLESTON SC	26.00	
Mar-31-16 Copying 3rd floor copier for the month of March	0.05	
Apr-01-16 Telephone Spirit, inv # 942922	17.00	
	3.00	
	3.00	
Apr-13-16 Local Travel - JCW PARKING IN CHARLESTON TO ATTEND HEARING ON ROOF CASE 03/28/16	3.00	
Apr-13-16 Local Travel - JCW PARKING IN CHARLESTON TO ATTEND HEARING ON ROOF CASE 04/13/2016	15.75	
Apr-30-16 Copying 3rd floor copier from the month of April	0.25	
May-31-16 Copying MKG- 3rd floor printer from month of May	0.50	
Jun-30-16 Copying 3rd floor printer, MKG from the month of June	0.25	
	400.00	
Jul-01-16 Court Fees Filing Fee - SCD CM ECF	1.30	
Jul-18-16 Local Travel CP, travel to and from SC Federal Court	60.00	
Jul-25-16 Process Services - Baker-Krantz Investigations & Process Services for service on U.S. District Attorney (P2635.00/MKG)	258.00	
Jul-31-16 Copying 2nd floor copier from the month of July	14.62	
	1.07	
Aug-01-16 Postage from the month of July	4.32	
Aug-01-16 Telephone from the month of July inv. # 990319		
Local Travel WF, Travel to and from Wingo Way, Mt. P on 7/5/16		

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	Local Travel CM, travel to and from 25 Calhoun on 6/27/16	0.32	
	Local Travel CM, travel to and from Charleston Pace on 6/30/16	0.65	
	Court Fees Court Fees Pacer Fees invoice dated 7/5/16 4/1/16-6/30/16	4.60	
Aug-31-16	Postage from the month of August	1.41	
Oct-31-16	Telephone Spirit, inv. #1038669 from the month of September	0.05	
Nov-30-16	Copying Printer reports from the month of November	4.50	
	Court Fees PACER, inv. # 2613916-Q32016 7/1-9/30/16	2.20	
Dec-31-16	Copying 3rd floor copier from the month of December	15.25	
Feb-01-17	Online research Westlaw, Inv. # 835533455, 1/1/17-1/31/17	207.71	
Feb-28-17	Copying 3rd floor copier from the month of February	11.75	
Mar-31-17	Copying 3rd floor copier for the month of March	7.75	
Apr-30-17	Court Fees Pacer, dated 1/1-3/31/17	13.70	
May-01-17	Copying MKG printer for the month of May	19.50	
Jun-14-17	Out Of Town Travel - Joseph C. Wilson 06/12/17 - 06/14/17 Travel to West Virginia to attend depositions of FBI agents - Simmons (P2635.00)	1,669.20	
Jun-30-17	Copying 3rd floor copier from the month of June.	25.00	
	Copying 2nd floor copier from the month of June.	1.50	
	Postage from the month of June	0.92	
Jul-14-17	Other - Gedney M. Howe, III, P.A. - 1/16th of FBI Deposition costs for court reporter, Hilton Garden Inn and Sky High Air - Simmons (P2635.00)	449.29	
Jul-31-17	Copying 2nd floor copier from the month of July	7.00	
	Postage from the month of July	2.43	
Aug-01-17	Court Fees Pacer Inv. # 2613916-Q22017, dated 8/10/17	0.60	
Oct-01-17	Court Fees Pacer, inv. # 2613916-Q32017	2.40	
Oct-16-17	Local Travel GT, 8 Chalmers Street	1.61	
Oct-18-17	Out Of Town Travel by Joe Wilson to Clarksburg, WV for deposition - Simmons (P2635.00/JCW)	1,858.53	
Oct-31-17	Copying 3rd floor copier from the month of October	79.75	
Dec-31-17	Copying 3rd floor copier from the month of December.	52.25	
Feb-01-18	Court Fees 4th Quarter 2017 Pacer Charges 8 @ 0.10	0.80	
	Court Fees 4th Quarter 2017 Pacer Charges 9 @ 0.10	0.90	
	Court Fees 4th Quarter 2017 Pacer Charges 5 @ 0.10	0.50	
Feb-06-18	Local Travel by Joe Wilson - reimbursement for parking ticket at meeting to discuss hearing on Motion to Dismiss - Simmons (P2635.00/JCW)	14.00	
Feb-13-18	Postage 1 @ 0.47	0.47	
Feb-28-18	Copying 2nd Floor for the month of February 1 @ 0.25	0.25	
Mar-20-18	Local Travel - parking for hearing on 3/20/18 - Simmons (P2635.00/JCW)	7.00	
Mar-31-18	Copying 3rd Floor Copier for month of March 291 @ 0.25	72.75	
	Copying 2nd Floor copier for three month of March 15 @ 0.25	3.75	
Apr-05-18	Pacer 01/01/18 to 03/31/18	41.00	
Jun-30-18	Copying 3rd fl copier June 2018 32 @ 0.25	8.00	
Jul-31-18	Copying - July 2018 2nd Floor Copier 8 @ 0.25	2.00	

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Aug-10-18	Court Fees - SCD CM ECF via Pay.gov, Notice of Filing Appeal fee, paid with firm cc on 8/10/18 - Simmons (P2635.00, KDF)	505.00	
Aug-31-18	Copying- August 2018 (25th -31st) 24 @ 0.25	6.00	
Oct-10-18	Postage - October 2018 2 @ 2.89	5.78	
Nov-30-18	Postage Expense - November 2018 1 @ 3.10	3.10	
Dec-04-18	Copying - November 2018 3rd Floor Copier (11/1-12/4) 57 @ 0.25	14.25	
Dec-31-18	Postage Expense - 2019 2 @ 2.26	4.52	
Jan-31-19	Copies- 2nd Floor copier (12/11/18-1/30/19) 36 @ 0.25	9.00	
May-01-19	Other Professionals - PACER Service 10/1/18-12/31/18; Acct #2613916	4.40	
May-07-19	Out Of Town Travel - JCW - Airfare, travel to/from Richmond, VA to attend 4th Circuit Court of Appeals and Argument, Total \$1,166.00, Simmons (P2635.00 / jcw)	1,166.00	
	Out Of Town Travel - JCW - Hotel, travel to/from Richmond, VA to attend 4th Circuit Court of Appeals and Argument, Total \$268.69, Simmons (P2635.00 / jcw) 1 @ 268.69	268.69	
	Out Of Town Travel - JCW - Mileage, travel to/from Richmond, VA to attend 4th Circuit Court of Appeals and Argument, Total \$13.92, Simmons (P2635.00 / jcw) 24 @ 0.58	13.92	
	Out Of Town Travel - JCW - Parking, travel to/from Richmond, VA to attend 4th Circuit Court of Appeals and Argument, Total \$30.00, Simmons (P2635.00 / jcw) 1 @ 30.00	30.00	
	Out Of Town Travel - JCW - Taxi, travel to/from Richmond, VA to attend 4th Circuit Court of Appeals and Argument, Total \$40.00, Simmons (P2635.00 / jcw) 1 @ 40.00	40.00	
	Out Of Town Travel - JCW - Meals, travel to/from Richmond, VA to attend 4th Circuit Court of Appeals and Argument, Total \$63.24, Simmons (P2635.00 / jcw) 1 @ 63.24	63.24	
	Out Of Town Travel - JCW - Tips, travel to/from Richmond, VA to attend 4th Circuit Court of Appeals and Argument, Total \$5.00, Simmons (P2635.00 / jcw) 1 @ 5.00	5.00	
Sep-12-19	Local Travel - CEP, Mileage, to/from Conway, SC 9/12/2019 - Simmons (P2635.00, CEP) 240 @ 0.58	139.20	
	Local Travel - CEP, Meals, to/from Conway, SC 9/12/2019 - Simmons (P2635.00, CEP) 1 @ 62.28	62.28	
Dec-03-19	Credit - Prime Video (via Firm CC) 12/03/19 - Simmons (P2635.00)	-14.99	
	Other - Amazon, Movie (Firm CC) 12/03/19 - Simmons (P2635.00, MKG) 1 @ 14.99	14.99	
	Other - Amazon, Movie (Firm CC) 12/03/19 - Simmons (P2635.00, MKG) 1 @ 14.99	14.99	
Dec-19-19	Postage - December 2019 2 @ 0.80	1.60	
Dec-30-19	Copying - December 2019- 3rd Floor Copier 24 @ 0.07	1.68	
Jan-16-20	Postage - January 2020	1.00	
Jan-31-20	Copying - January 2020 - 2nd Floor Copier	0.14	
Mar-06-20	Postage - March 2020 1 @ 0.50	0.50	
Mar-16-20	Postage - March 2020 1 @ 0.50	0.50	
	Postage - March 2020 1 @ 0.65	0.65	

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Mar-18-20	Copying - March 2020- 2nd Floor Copier 14 @ 0.07	0.98	
Apr-28-20	Postage - April 2020 1 @ 8.00	8.00	
Apr-30-20	Copying - April 2020, 2nd Floor Copier 10 @ 0.07	0.70	
May-21-20	Medical Reports - Med Univ of SC via Ciox Health, (Firm CC) - Simmons (P2635.00, MKG)	102.99	
May-28-20	Other - SC DHEC for certified copies of death certificate - Daniel L. Simmons, Sr. (P2635.00\MKG)	24.00	
May-29-20	Postage - May 2020 1 @ 0.50	0.50	
May-31-20	Copying - May 2020 - 3rd Floor Copier 7 @ 0.07	0.49	
	Copying - May 2020 - 2nd Floor Copier 2 @ 0.07	0.14	
Jun-15-20	Postage - June 2020 6 @ 0.50	3.00	
Jun-19-20	Postage - June 2020 1 @ 1.80	1.80	
Jun-26-20	Postage - June 2020 1 @ 0.65	0.65	
Jun-30-20	Copying - June 2020 - 3rd Floor Copier 1 @ 0.07	0.07	
Jul-01-20	Other professionals - Liz Oakley Productions, Retainer fee, Inv. # 1258 dated 3/25/20 - Simmons (P2635.00, MKG) 1 @ 3000.00	3,000.00	
Jul-10-20	Local Travel - JTR, Mileage, to/from 101 Meeting Street 6/25/20 - Simmons (P2635.00, MKG) 1.60 @ 0.575	0.92	
Jul-22-20	Postage - July 2020 1 @ 0.50	0.50	
	Out Of Town Travel - Rose Simmons - Reimbursement for travel costs for meeting with Liz Oakley - Daniel Simmons (P2635.00\MKG)	250.00	
Aug-19-20	Postage - August 2020 1 @ 0.50	0.50	
Sep-25-20	Postage - September 2020 1 @ 0.95	0.95	
Oct-07-20	Court Fees - Pacer research, Inv # 5330348-Q32020, Inv date 10/7/20, paid with firm cc on 11/24/20 - Simmons (P2635.00)	12.60	
Oct-14-20	EXPERTS - Marsjall Allyn White, MD, Retainer, Inv. dated 10/14/20 - Simmons (P2635.00, MKG) 1 @ 5000.00	5,000.00	
	Other - Charleston County Probate Court via Petty Cash for updated Daniel L. Simmons, Jr. Certificate of Appointment of PR of the Estate of Daniel L. Simmons, Sr. (P2635.00\MKG)	1.00	
	Medical Reports - Charleston County Coroner's Office for copy of entire file - Daniel L. Simmons (P2635.00\MKG)	120.00	
Oct-19-20	Postage - October 2020 2 @ 16.30	32.60	
	Medical Reports -Charleston County Coroner's Office - Copy of Entire File - Daniel L. Simmons (P2635.00\MKG)	258.00	
Oct-26-20	Other Professionals - Liz Oakley Productions - Simmons (P2635.00\CEP)	26,500.00	
Oct-27-20	Postage - October 2020 1 @ 0.50	0.50	
	Local Travel - AES, Mileage, Dr. White's Office 10/14/20 - Simmons (P2635.00, MKG) 24 @ 0.575	13.80	
	Local Travel - AES, Mileage, Gedney M. Howe 10/14/20 - Simmons (P2635.00, MKG) 8 @ 0.575	4.60	
	Local Travel - AES, Mileage, Coroner's Office 10/20/20 - Simmons (P2635.00, MKG) 18 @ 0.575	10.35	
Oct-29-20	Local Travel - JTR, Mileage, to/from Charleston County Probate Court 10/14/20 - Simmons (P2635.00, MKG) 1.60 @ 0.575	0.92	
Oct-31-20	Copying - 3rd Floor Copier - October 2020 54 @ 0.07	3.78	
	Copying - 3rd Floor Copier - October 2020 10 @ 0.07	0.70	

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	Copying - 2nd Floor Copier - October 2020 62 @ 0.07	4.34	
Jan-06-21	Court Fees - Pacer 10/1/2020 - 12/31/2020 1 @ 6.00	6.00	
Aug-09-21	Postage 1 @ 0.51	0.51	
Sep-28-21	POSTAGE , FedEx, Inv # 7-514-22280, Inv date 9/28/21 1 @ 17.25	17.25	
Sep-30-21	Copying 110 @ 0.10	11.00	
Oct-04-21	Other - Hotel for Beneficiaries to attend Mediations and Meetings on 10/4/21-10/8/21 in Charleston - Simmons (P2635.00/CEP)	2,554.11	
Oct-21-21	Other - Strom Law Firm, LLC, Emmanuel Costs - Simmons (P2635.00/MKG)	2,292.54	
Oct-25-21	Arbitration/Mediation - Wills Massalon & Allen, Mediatoin Date 10/6/21-10/8/21, Inv # 48901, Inv date 10/25/21 - Simmons (P2635.00/MKG)	1,002.85	
Oct-26-21	Arbitration/Mediation - Savage Law Firm - DPK Media (P2635.00\CEP)	951.79	
	Arbitration/Mediation - McGowan Hood Felder - Research - (P2635.00\CEP)	99.76	
Disbursement Grand Total		\$50,083.71	\$0.00

GRAND TOTAL FEES & DISBURSEMENTS \$50,083.71

Task Totals	0.00	\$0.00
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DISBURSEMENT SUMMARY

E101	Copying	
	Total Disbursements	669.52
E105	Telephone	
	Total Disbursements	1.17
E106	Online research	
	Total Disbursements	207.71

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E108	Postage		
	Total Disbursements		90.67
E109	Local Travel		
	Total Disbursements		8.20
E112	Court Fees		
	Total Disbursements		64.20
E123	Other professionals		
	Total Disbursements		3,000.00
P101	Copies		
	Total Disbursements		9.00
P107	Process Services		
	Total Disbursements		60.00
P108	POSTAGE		
	Total Disbursements		17.25
P109	Local Travel		
	Total Disbursements		259.07
P110	Out Of Town Travel		
	Total Disbursements		5,364.58

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P112 Court Fees

Total Disbursements 905.00

P119 EXPERTS

Total Disbursements 5,000.00

P121 Arbitration/Mediation

Total Disbursements 2,054.40

P123 Other Professionals

Total Disbursements 26,504.40

P124 Other

Total Disbursements 5,350.92

P150 Medical Reports

Total Disbursements 480.99

par Parking

Total Disbursements 3.00

psx Postage Expense

Total Disbursements 7.62

Total Disbursements

\$50,083.71